

LDWSF
4.8.3.2
2/5/14

Sanga, Ravi

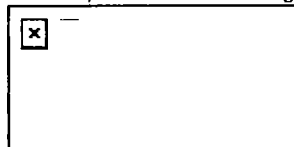
From: Dyer, Miles [mdyer@JorgensenForge.com]
Sent: Wednesday, February 05, 2014 1:15 PM
To: Sanga, Ravi; Ernst, William D
Cc: Chu Rebecca; Tom Colligan; Amy Essig Desai; Ryan Barth; Dee Gardner; Jim Trueblood
Subject: RE: Section 10 of the Rivers and Harbors Act
Attachments: JFCOS Sect10RH Final with Figures.pdf

Ravi

Please find attached a memorandum in response to your email requesting information pertaining to Section 10 (Rivers and Harbors Act) of the Clean Water Act.

Thank you for your continuing assistance.

Miles Dyer
Director, Environmental Programs



Jorgensen Forge Corporation
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From: Sanga, Ravi [<mailto:Sanga.Ravi@epa.gov>]
Sent: Monday, February 03, 2014 5:38 PM
To: Ernst, William D; Dyer, Miles
Cc: Chu Rebecca
Subject: Section 10 of the Rivers and Harbors Act

Will and Miles – It looks like JF/Boeing will need to meet substantive compliance of Section 10 (Rivers and Harbors Act) of the CWA. This would require a memo to the agency (me) that documents when the coffer dam would be installed, the dimensions of the dam, purpose, depth etc and that it would not adversely affect navigability because it will be clearly tagged (state how) and that the USCG would be informed and when the dam would be removed. I'll be out Tues (tomorrow), but let's talk Wed about this issue.

Ravi

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The Intelligence Group

RESEARCH ▼ INVESTIGATIONS ▼ FORENSICS

TO: RAVI SANGA (EPA)

FROM: PHILIP SPADARO, P.G. AND BOB ROMAGNOLI, P.E.

SUBJECT: JORGENSEN FORGE OUTFALL SITE - STEEL SHEET PILE WALL
INSTALLATION – REQUIREMENTS COORDINATION WITH US COAST
GUARD

DATE: FEBRUARY 5, 2014

APPROVED BY: MILES DYER (JORGENSEN FORGE CORPORATION)

WILLIAM ERNST (THE BOEING COMPANY)

CC: TOM COLLIGAN (FLOYD | SNIDER)
AMY ESSIG-DESAI (FARALLON CONSULTING, LLC)
RYAN BARTH (ANCHOR QEA, LLC)
DEBORAH GARDNER (SOUNDEARTH STRATEGIES, INC.)
JIM TRUEBLOOD (B&T DESIGN AND ENGINEERING)

For purposes of the Steel Sheet Pile (SSP) Installation Project scheduled to begin later this month at the Jorgensen Forge Outfall Site (JFOS), this memorandum addresses selected Applicable or Relevant and Appropriate Requirements (ARARs) that require attention prior to construction. In an email dated Monday, February 3, 2014, The U.S. Environmental Protection Agency (EPA) requested that Jorgensen Forge Corporation (JFC) and The Boeing Company (Boeing) (collectively known as the Owners) address Section 10 of the Rivers and Harbors Appropriations Act (33 USC 403; 33 CFR 320, 322) and Section 401 of the Clean Water Act [33 USC 1341; 40 CFR 121.2(a) (3) and (4)] as they pertain to the approved project. As indicated in the January 10, 2014 SSP Design Memorandum (Design Memo), the Owners understand that EPA will define pertinent ARARs for the project (The Intelligence Group [TIG], 2014a). While

actual Federal and State permits will not be required, the project will still need to meet the substantive requirements of such ARARs.

This SSP Installation Project is being conducted pursuant to the Second Modification for Administrative Order on Consent for Removal Action (Order), Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Docket No. 10-2011-0017, signed by JFC, Boeing and EPA on June 25, 2013 (Second Modification, EPA, 2013). As stipulated in the Second Modification, the Owners have agreed to install a SSP wall along the Lower Duwamish Waterway (LDW) shoreline bank at the northwestern corner of the JFC property and the southwestern corner of the Boeing Plant 2 property.

The JFC Property is located in the municipality of Tukwila, King County, Washington (Figure 1), and is bounded by Boeing Plant 2 to the north, East Marginal Way and King County International Airport to the east, Boeing Isaacson Property to the south, and the LDW to the west (Figure 2). The JFOS encompasses a portion of both the JFC Property and Boeing Plant.

Installation of this new SSP structure is a significant component of two relatively larger environmental remediation projects. The first project (known as the JFOS, and subject of the above-referenced Order) involves the investigation and clean-up of contamination related to former property line storm drain outfalls located along JFC property (see Figure 3). Work associated with this project (including the SSP installation) is intended to control the potential discharge of polychlorinated biphenyls (PCBs) and other hazardous substances from the JFOS directly to the LDW.

The second related project is known as the Jorgensen Forge Early Action Area (JFEAA), which focuses on the dredging/excavation of LDW shoreline materials and sediments. A portion of this remedial area is presented in Figure 3, while a more comprehensive representation is presented in Anchor QEA's (AQEA) Addendum 2 to the JFEAA Contract Documents (AQEA, 2013). A segment of the targeted bank soils/sediments (known as JFOS Impacted Shoreline Material) will be directly supported by the proposed SSP wall. The program is scheduled to begin in the summer of 2014, and is being led by Earl M. Jorgensen (EMJ), the former owner of the JFC property.

Summary of SSP Installation Project

The project's design drawings and associated specifications were provided to (and ultimately approved by) EPA on January 20, 2014 (TIG, 2014b). As indicated in the design package, the SSP Installation Project will consist of installing approximately 150 lineal feet of AZ 38-700N steel sheets, which together will form a rectangular cofferdam (approximately 36' x 33') within a portion of the LDW. This relatively small structure will serve to minimize the release of PCB-containing soils/sediments during excavation of the JFOS Impacted Shoreline Material by enclosing this future in-water operation. The cofferdam's footprint will not encroach into the river's navigational channel.

Each steel sheet will be a total of 60' in length, and will support excavation depths of up to -15 feet Mean Lower Low Water (MLLW). The top of the SSP wall (along entire cofferdam perimeter) is designed to be at an elevation of +15 feet MLLW. Given the depth of removal described above, the SSP wall will need to withstand significant forces during sediment removal operations. To help alleviate these forces, approximately 5 to 10 feet of soil will be removed from behind the top of bank wall prior to the start of dredging operations. In addition, any rip rap or debris along the perimeter of the cofferdam will need to be removed accordingly.

Prior to any upland and/or SSP work, the contractor will install all required construction fences, silt fences and silt curtains. In addition, a blanket of sand will be placed along the perimeter of the cofferdam (i.e., along the three in-water walls) to serve as scour protection during/after installation of the steel sheets. As the design specifies, this layer will be five feet wide and 4 to 6 inches thick. The contractor intends to place the sand using a 60 x 160 Crane Barge with a 150-ton crane and an anchor spud system. A separate barge (1800 ton) will carry the material. The contractor will place the sand as close to the river bottom as possible to avoid dispersion while also minimizing resuspension of existing sediments.

The same barge/crane system will be used for purposes of the cofferdam installation. To actually drive the sheets, the contractor will primarily use a vibratory hammer. However, should conditions dictate, an impact hammer will also be available for use. As indicated above, a silt curtain will be utilized to the extent possible to minimize any release of suspended material produced during the construction operations.

It is expected that mobilization will begin on February 10, 2014, with in-water activities slated to start on February 12, 2014. In order to meet the regional fish window deadline, all in-River structures (i.e., three of the four walls) will be constructed no later than March 7, 2014. The remainder of the SSP (i.e., 33' of wall along top of bank) would follow immediately thereafter. It is expected that the entire project would be completed by the end of March 2014, which would allow for the JFEAA in-water work (including removal of material from within the cofferdam) to begin by the August 1, 2014 deadline.

Given the above, the cofferdam structure will sit idle for approximately four months (April 1 through August 1). Once the sediments from within the structure are actually dredged (and the area backfilled) as part of the JFEAA project, the in-water SSP will be removed and appropriately decontaminated. This is expected to occur no later than mid-September, 2014. At this time, the Owners anticipate that the wall along the top of bank will remain in place.

US Coast Guard Coordination

The selected contractor (Pacific Pile and Marine) is required to maintain close coordination with the U.S. Coast Guard (USCG) throughout the project. While a permit is not required as part of this work (i.e., given its Superfund status), it is important that any substantive USCG requirements be met.

Based on recent discussions with Mr. Timothy Westcott of the USCG, the contractor will place flashing yellow lights (1-2 nautical miles, 30 flashes per minute) on each of the outer corners (South A3 and West A1) of the cofferdam. This will help to ensure that the cofferdam structure will not adversely affect marine navigability. In addition, Mr. Westcott's office will issue weekly mariner bulletins identifying the project's start-up, SSP installation, idle period, dredging activity, and SSP extraction.

The Owners hope that this memorandum serves to adequately describe the project, and alleviate any potential concerns related to water quality and/or impact to local navigation. Should further detail be required, please do not hesitate to contact us.

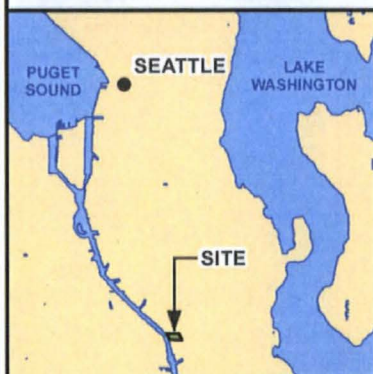
References

Anchor QEA, LLC. 2013. Contract Documents, Addendum No. 2. Jorgensen Forge Early Action Area Removal Action. December 23, 2013.

The Intelligence Group (TIG). 2014a. Jorgensen Forge Outfall Site, Steel Sheet Pile Wall Design Memorandum. January 10, 2014.

TIG. 2014b. SSP Installation Project, Final Drawings and Specifications. January 20, 2014.

U.S. Environmental Protection Agency. 2013. Second Modification for Administrative Order on Consent for Removal Action, Jorgensen Forge Outfall Site, with Jorgensen Forge Corporation, Boeing Company, and EPA. CERCLA Docket No. 10-2011-0017. June 25.



NOTE:

1. AERIAL IMAGERY PROVIDED BY THE UNITED STATES GEOLOGICAL SURVEY COLLECTED IN 2013 AS PART OF THE NATIONAL AGRICULTURE IMAGERY PROGRAM.

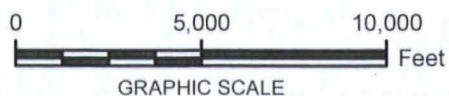


FIGURE 1

**JORGENSEN FORGE
PROPERTY LOCATION**

JORGENSEN FORGE CORPORATION/THE BOEING COMPANY
JORGENSEN FORGE OUTFALL SITE

Sanga, Ravi

From: Dyer, Miles [mdyer@JorgensenForge.com]
Sent: Wednesday, February 05, 2014 4:07 PM
To: Sanga, Ravi; Ernst, William D
Cc: Tom Colligan; Dee Gardner
Subject: RE: Section 10 of the Rivers and Harbors Act

Ravi,

The sheet steel left in the upper bank after the coffer dam has been removed from the water will not make contact with the water. The sheet steel is 4 feet above MHHW.

Miles

From: Sanga, Ravi [mailto:Sanga.Ravi@epa.gov]
Sent: Wednesday, February 05, 2014 3:08 PM
To: Dyer, Miles; Ernst, William D
Cc: Tom Colligan; Dee Gardner
Subject: RE: Section 10 of the Rivers and Harbors Act

Miles and Will is the landward section of the coffer dam that will remain in place (after the in-water dredging is completed) located above MHHW (ie outside a water of the US)?

In otherwords, is the coffer dam officially outside a "water of the US", ie above MHHW? It needs to be.

Please let me know ASAP, thanks !

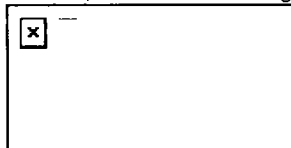
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Director, Environmental Programs



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